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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MERRILL LYNCH BUSINESS FINANCIAL SERVICES, INC.	:	Civil Action No. 06 Civ. 4802 (DMC)
	:	
Plaintiff,	:	Hon. Dennis M. Cavanaugh, U.S.D.J.
	:	
vs.	:	
	:	
ARTHUR KUPPERMAN, E. ROSS BROWNE, PAULETTE KRELMAN and PGB INTERNATIONAL, LLC, and JPMorgan Chase Bank, N.A.	:	<b>DEFENDANT KRELMAN'S COUNTERSTATEMENT TO PLAINTIFF'S LOCAL RULE 56.1 STATEMENT OF MATERIAL FACTS AS TO WHICH THERE DOES NOT EXISTS A GENUINE ISSUE</b>
Defendants.	:	

**COUNTERSTATEMENT OF FACTS**

1. Defendant Krelman asserts her Fifth Amendment Privilege as to the statements contained in paragraph one.

2. Defendant Krelman refers to Exhibit A to the Declaration of Frederick B. Polak, Esq. in response to the statements contained in paragraph two.

3. The statements in paragraph three do not relate to Defendant Krelman, and therefore, they are neither admitted nor denied.

4. Defendant Krelman refers to Exhibit A to the Declaration of Frederick B. Polak, Esq. in response to the statements contained in paragraph four.

5. Defendant Krelman asserts her Fifth Amendment Privilege as to the statements contained in paragraph five.

6. Defendant Krelman asserts her Fifth Amendment Privilege as to the statements contained in paragraph six.

7. The statements contained in paragraph seven merely represent legal argument, and, therefore, Defendant Krelman can neither admit nor deny them.

8. The statements contained in paragraph eight merely represent legal argument, and, therefore, Defendant Krelman can neither admit nor deny them.

9. The statements contained in paragraph nine merely represent legal argument, and, therefore, Defendant Krelman can neither admit nor deny them.

10. Defendant Krelman refers to Exhibit A to the Declaration of Frederick B. Polak, Esq. in response to the statements contained in paragraph ten.

11. Defendant Krelman refers to Exhibit A to the Declaration of Frederick B. Polak, Esq. in response to the statements contained in paragraph eleven.

12. The statements contained in paragraph twelve merely represent legal argument, and, therefore, Defendant Krelman can neither admit nor deny them.

POST, POLAK, GOODSSELL, MACNEILL  
& STRAUHLER, P.A.  
Attorneys for Defendant Paulette Krelman

By: s/Frederick B. Polak  
Frederick B. Polak

Dated: November 27, 2006